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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:

YONG SUCK LEE,

Debtor.

Case No: 18-11532 (VFP)

Chapter 13

Hearing Date: Jan. 3, 2019
10:00 AM

CERTIFICATION IN OPPOSITION TO DEBTOR'S MOTION FOR AN ORDER
QUASHING RULE 2004 SUBPOENA AND OTHER RELIEF

I, Jae Y. Kim, hereby certify:

1. I am an attorney at law of the State of New Jersey and represent JR Arts And Crafts Co., LTD ("JR Arts"), a creditor herein.

2. I submit this certification in opposition to the Debtor's Motion For an Order Quashing Rule 2004 Subpoena Directed To Yong Suck Lee and For Other Relief.

3. By way of background, pursuant to a 2017 New York State Court litigation case, *JR Arts is a claimant against the debtor; JR Arts And Crafts Co., LTD vs. Natasha Accessories LTD., Qualiti, Inc., Ravie Singh aka Gokaran Singh, Andy Yong Jin Lee*

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and Robert Yong Suck Lee, Index Number 654618/2017 (the "State Court Litigation"). The complaint in the State Court Litigation was filed on or about August 23, 2017.

4. On or about December 8, 2017, the debtor herein filed a general denial Answer to the State Court Litigation through the Law Offices of Shawn J. Wallach, PC of New York, New York.

5. On January 25, 2018, the debtor filed the within Chapter 13 case. However, at no time and notwithstanding the State Court Litigation, JR Arts was not named as a creditor on the debtor's schedules or creditor's matrix. As such, at no time did JR Arts receive notice of the debtor's bankruptcy filing. State Court Litigation counsel did not forwarded notice of the bankruptcy filing to JR Arts' State Court Litigation counsel either.

6. Nonetheless, JR Arts is now aware of this Chapter 13 filing and JR Arts' State Court counsel has advised the State Court of this pending bankruptcy and JR Arts is seeking to obtain information from the Debtor herein.

7. JR Arts' subpoena was emailed to Debtor's counsel on November 5, 2018. Thereafter, Debtor's counsel filed this Motion to Quash the very next day, on November 6, 2018.

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8. JR Arts is seeking discovery herein in an attempt to see if an Adversary Proceeding is warranted. Upon information and belief, the debtor was an owner, partial owner and/or manager of Qualiti, Inc. As such, many of the Qualiti, Inc. Documents may be in the Debtor's possession.

9. It appears disingenuous for the Debtor's counsel to argue that it would be an undue burden for the debtor to locate any documents rather than certain particular documents. We have no sworn statement from the Debtor affirming that locating any of the documents requested would be an undue burden.

10. Further, we have no sworn statement from the Debtor stating that he has no documents as they relate to Qualiti, Inc, in his possession.

11. Accordingly, JR Arts should be afforded it opportunity to discovery.

I certify the foregoing statements made by me are true. I am aware that if any of the statements are willfully false I am subject to punishment.

Dated: December 27, 2018

/s/Jae Y. Kim

Jae Y. Kim, Esq.